

ARDC No. 01144642

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LAMAR C. CHAPMAN, III,

Plaintiff,

V.

THE VILLAGE OF HINSDALE, ILLINOIS
an Illinois Municipal Corporation,
THE HINSDALE POLICE DEPARTMENT,
and UNKNOWN OTHERS,

Defendants.

No. 07 CV 7232

Judge Lindberg
Magistrate Judge Brown

MOTION

NOW COME the defendants, KEVIN SIMPSON, CHARLES LEUVER, and
BRADLEY BLOOM, incorrectly sued as Lawrence Bloom, by and through their attorneys,
HARTIGAN & CUISINIER P.C., and for their motion to adopt the motion to dismiss filed by
the VILLAGE OF HINSDALE on May 5, 2008, hereby state as follows:

1. That on April 30, 2008 this Honorable Court granted plaintiff leave to file a First Amended Complaint.
2. That at the court hearing on April 30, 2008 the defendant requested and was granted until May 5, 2008 within which to file their motion to dismiss the First Amended Complaint.
3. That the First Amended Complaint added additional parties, including KEVIN SIMPSON, CHARLES LEUVER, and BRADLEY BLOOM, incorrectly sued as Lawrence Bloom.

4. That the aforementioned individuals filed their Waivers and an Appearance has been entered on their behalf.

5. That the motion to dismiss filed on behalf of the VILLAGE OF HINSDALE is equally applicable to the individual defendants.

6. That there is currently a briefing schedule in place that allows the plaintiff to respond to the motion to dismiss by May 19, 2008; a reply is due by May 26, 2008; and a ruling is scheduled for June 25, 2008 at 9:30 a.m.

7. That the newly named individual defendants seek to adopt the VILALGE OF HINSDALE's motion to dismiss as their motion to dismiss.

WHEREFORE, for all the foregoing reasons, the defendants, KEVIN SIMPSON, CHARLES LEUVER, and BRADLEY BLOOM, incorrectly sued as Lawrence Bloom, respectfully request this Honorable Court enter an order in accordance with the foregoing, and for such other and further relief as this Court deems just and proper.

Respectfully Submitted,

/s/Patrick H. O'Connor
Patrick H. O'Connor, one of the
attorneys for the defendants, The
Village of Hinsdale, Illinois, an Illinois
municipal corporation, and The Hinsdale
Police Department

Russell W. Hartigan
Patrick H. O'Connor
HARTIGAN & O'CONNOR P.C.
222 North LaSalle Street, Suite 2150
Chicago, Illinois 60601
(312)201-8880